

**UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

DO NO HARM, a nonprofit corporation
Incorporated in the State of Virginia

Plaintiff,

v.

WILLIAM LEE, in his official capacity as
Governor of the State of Tennessee,

Defendant.

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Case No. 3:24-cv-01334
Chief Judge Campbell

THIRD NOTICE AND JOINT STATUS REPORT

On December 20, 2024, on motion of the parties, the Court granted the parties' Joint Motion to Stay Proceedings (Doc. 21). After the parties filed the Second Joint Notice and Status Update, the Court directed the parties to "file a status update" by April 30, 2025, "if the case has not been resolved." (Doc. 24).

In accordance with that Order, the parties file this Third Notice and Joint Status Report. As of the date of this Joint Status Report, the case has not been resolved. But the parties note recently passed legislation that, if signed by the Governor, will repeal all of the challenged laws. *See* H.B. 1237, 114th Gen. Assemb., Reg. Sess. (TN 2025); S.B. 1235, 114th Gen. Assemb., Reg. Sess. (TN 2025); S.B. 1084, 114th Gen. Assemb., Reg. Sess. (TN 2025).

The parties report that they continue to be engaged in good-faith settlement negotiations to resolve both this case and a related case currently on appeal together.¹ The parties agree the stay

¹ *See Do No Harm v. Lee*, No. 24-5937 (6th Cir.).

should remain in effect because: 1) settlement negotiations remain ongoing; and 2) recently passed legislation, if signed by the Governor, will repeal or amend all the challenged laws, thus impacting potential resolution of this matter. *See* H.B. 1237, 114th Gen. Assemb., Reg. Sess. (TN 2025); S.B. 1235, 114th Gen. Assemb., Reg. Sess. (TN 2025); S.B. 1084, 114th Gen. Assemb., Reg. Sess. (TN 2025). The parties intend to come to an agreement in the coming months.

Respectfully submitted,

JONATHAN SKRMETTI
ATTORNEY GENERAL AND REPORTER

/s/ Andrew D. Denning
Andrew D. Denning (BPR #042208)
Assistant Attorney General
General Litigation Division
Post Office Box 20207
Nashville, TN 37202
Telephone: (615) 253-1103
andrew.denning@ag.tn.gov

Attorney for Defendant

/s/ Caleb R. Trotter
Caleb R. Trotter, Cal. Bar No. 305195*
PACIFIC LEGAL FOUNDATION
555 Capitol Mall, Suite 1290
Sacramento, CA 95814
Telephone: (916) 419-7111
CTrotter@pacificlegal.org

/s/ David J. Hoffa
David J. Hoffa, Ariz. Bar No. 038052*
PACIFIC LEGAL FOUNDATION
3241 E. Shea Blvd., Suite 108
Phoenix, AZ 85028
Telephone: (916) 419-7111
DHoffa@pacificlegal.org

/s/ Daniel J. Turklay

Daniel J. Turklay (#034600)

TURKLAY LAW

11205 Lebanon Rd #51

Mt. Juliet, TN 37122

Telephone: (615) 838-5903

Fax: (888) 868-0014

daniel@turklaylaw.com

**Pro Hac Vice Attorney*

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on Wednesday, April 30, 2025, a true and correct copy of the foregoing has been forwarded via the Court's electronic filing system to all counsel of record.

Caleb Trotter
Pacific Legal Foundation
555 Capitol Mall, Suite 1290
Sacramento, CA 95814
916.419.7111
CTrotter@pacificlegal.org

David J. Hoffa, Ariz. Bar No. 038052*
PACIFIC LEGAL FOUNDATION
3241 E. Shea Blvd., Suite 108
Phoenix, AZ 85028
Telephone: (916) 419-7111
DHoffa@pacificlegal.org

Daniel J. Turklay (#034600)
TURKLAY LAW
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Fax: (888) 868-0014
daniel@turklaylaw.com

s/ Andrew D. Denning
Andrew D. Denning